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16 Attorneys for Defendants Alibaba Group Holding, Ltd., Alibaba Cloud Computing, Ltd., Nimbus
17 Development, Inc., Alibaba.com, Inc., Alibaba Singapore E-Commerce Private Ltd., and
Alibaba.com Hong Kong Ltd.

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

21 GLOBAL EQUITY MANAGEMENT (SA)
PTY. LTD., Plaintiff,

Case No. 3:17-cv-02177-WHA
Case No. 3:17-cv-02435-WHA

23 v.

**DECLARATION OF ROGER SHANG IN
SUPPORT OF ALIBABA DEFENDANTS'
MOTION FOR ENTITLEMENT TO
ATTORNEYS' FEES**

24 ALIBABA GROUP HOLDING, LTD., ET
AL.,

Judge: Hon. William H. Alsup

25 Defendants.

26 **REDACTED VERSION OF DOCUMENT
SOUGHT TO BE SEALED**

28

1 I, Roger Shang, hereby declare that:

2 1. I am over the age of eighteen and have personal knowledge about the facts described
3 below.

4 2. I am a Senior Legal Director for Alibaba Group. I submit this declaration in support of
5 the Alibaba Defendants' Motion for Attorneys' Fees.

6 3. On January 24, 2017, as the representative of the Alibaba Defendants, I attended a
7 mediation session for this case in San Francisco with Carey Ramos of Quinn Emanuel Urquhart &
8 Sullivan, LLP, outside counsel for the Alibaba Defendants. The mediation session was conducted by
9 Lee Kaplan of Smyser Kaplan & Veselka in Houston, Texas. GEMSA, the plaintiff in this case, was
10 represented at the mediation by Schumann Rafizadeh. GEMSA's outside counsel in attendance were
11 William Ramey of Ramey & Schwaller, LLP, and Rick Laminack and Tom Pirtle of Laminack, Pirtle
12 & Martines, LLP. The GEMSA team at the mediation also included two accountants whose names I
13 do not recall.

14 4. The mediation began with a brief joint session. The Mediator, Mr. Kaplan, explained
15 that GEMSA wanted to make a short initial statement. Mr. Laminack spoke for GEMSA, and said
16 that [REDACTED]

17 [REDACTED]
18 [REDACTED]

19 5. Mr. Ramos, our attorney, responded that, [REDACTED]

20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 [REDACTED]

27 6. The parties then split up into separate conference rooms, and the Mediator engaged in
28 separate sessions with the parties. Mr. Ramos told the Mediator that [REDACTED]

7. The Mediator then met with the GEMSA team and returned with their response. Mr.

Ramos explained to the Mediator that

8. The Mediator again met with the GEMSA team for an extended period of time. When

10 the Mediator finally returned, he explained GEMSA's replies. Mr. Ramos again responded,
11 explaining how GEMSA's replies were [REDACTED]

16 I declare under penalty of perjury under the laws of the United States that the foregoing is true
17 and correct.

Executed on March 19, 2020 in California.

/s/ Roger Shang

Roger Shang